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8 **UNITED STATES COURT**

9 **EASTERN DISTRICT OF CALIFORNIA**

10 SACRAMENTO HOMELESS UNION, a local of the CALIFORNIA HOMELESS UNION/STATEWIDE ORGANIZING COUNCIL, on behalf of itself and those it represents; BETTY RIOS; DONTA WILLIAMS; FALISHA SCOTT and all those similarly situated,

11 Plaintiffs

12 vs.

13 COUNTY OF SACRAMENTO, a political subdivision of the State of California; CITY OF SACRAMENTO, a municipal corporation; and DOES 1 – 100,

14 Defendants.

15) Case No.: 2:22-cv-01095-KJM-KJN
16) **SUPPLEMENTAL DECLARATION OF CRYSTAL ROSE SANCHEZ IN SUPPORT OF PLAINTIFFS' REPLY TO DEFENDANT COUNTY OF SACRAMENTO'S OPPOSITION TO PLAINTIFFS' MOTION FOR MANDATORY INJUNCTION**
17) Date: July 8, 2022
18) Time: 10:00 a.m.
19) Dept.: Courtroom 3
20) U.S. Chief District Judge Kimberly J. Mueller

21 **SUPPLEMENTAL DECLARATION OF CRYSTAL ROSE SANCHEZ**

22 I, CRYSTAL ROSE SANCHEZ, hereby swear and affirm that the following is a true and correct statement.

23 1. I am the President of the Sacramento Homeless Union ("SHU") and serve as a Western
24 Regional Director and Executive Board Member of the National Union of the Homeless.

25 2. The SHU has approximately 2,800 members and provides outreach to over 392
26 encampments in the Sacramento area. As a formerly homeless person and lifelong
27 Sacramento resident, I have been supporting and organizing our unhoused community

1 for over 20 years. As Union president, I am intimately familiar with hundreds, if not
2 thousands of homeless persons and because we have Union “leads” in all of the major
3 homeless encampments, we have reliable system through which we receive accurate
4 information regarding the status of the homeless, particularly during extreme weather
5 conditions.

6 3. Every year we face the same failures over the respite centers the lack of true
7 commitment to policy procedure that dictates the well-being of our unhoused. The latest
8 “point in time” count, released only days ago, showed that since 2019, there has been a
9 67% increase in the number of unsheltered homeless persons. This represents a huge
10 jump from the 5,570 persons previously identified by the County as unsheltered to 9,278
11 persons on the streets with little or no protection from the extreme heat we have
12 experienced and is forecasted for the next 14 days. Attached hereto as Exhibit A is a true
13 and correct copy of a June 29, 2022 story by reporter Maricela De La Cruz on the
14 increase in Sacramento Homelessness. Attached hereto as Exhibit B is a true and correct
15 copy of today’s National Weather Service 14-day forecast for the Sacramento area.
16
17 4. The respite from extreme weather is not a new issue. In fact up until June 15, 2022 the
18 County of Sacramento dictated cruel temperature specifications for the provision of
19 respites, also known as “cooling centers” while in last week of June, 2022, we had seven
20 consecutive days of triple-digit temperatures.
21
22 5. Since the Homeless Union filed for a temporary restraining order, I have made repeated on-
23 the-ground visits to homeless encampments around Sacramento County where I have
24 documented temperatures to which the unsheltered are being exposed. This includes
25 temperatures, in some cases exceeding 125 degrees Fahrenheit taken inside tents provided at
26 the Miller Park “Safeground”. Attached hereto as Exhibit C is a true and correct copy of a
27 June 27, 2022 report by local ABC news station Channel 10 which includes a link to a
28

1 YouTube video of the documentation of the extreme temperatures. Due to the impacts of
2 climate the asphalt stays at about 140 plus degrees on hot days and on cooler days about
3 120. Inside the motorhomes the temperatures are elevated especially when motorhomes have
4 been swept from underneath shaded areas. We must remember that tents only have a thin
5 layer of tarp on the bottom so people are in reality unprotected from the extreme heat
6 absorbed and retained by the asphalt as well as the release of dangerous chemicals released
7 from the superheated asphalt surface.

8
9 6. Due to these circumstances many people have died on the streets. The Sacramento Homeless
10 Union's position on the new weather requirement is that it has given them even more room
11 to not have to open respite to those living on the streets, seniors or those who have the need
12 for respite. The wording is not definitive and holds no real requirement and leaves for no
13 accountability. Nevertheless, the National Weather Service guidelines themselves provide
14 for special consideration and concern for particularly vulnerable populations such as the
15 unhoused. The lack of cooling centers has left thousands of people on the street to
16 potentially die under the medical circumstances as set forth by Dr Flojuane Cofer.

17
18 7. While I am not going to go over every temperature that we collected I would like to point
19 out the encampment at Evergreen. The first night we bought the infrared temperature gauge
20 we went out to one of the camps we work with that is constantly hit with vehicle removals
21 sweeps and more. At 709 p.m. we went out in the shade it was still 101.5° in the sun it was
22 120.4° inside one of our union members tents it was still 102.6, and in the RV with
23 cardboard insulated Windows it was 115.7. they were swept on 6/23/2022 just 3 days prior
24 were they all had to move around.

25
26 8. The situation with the tent and RV that I tested is critical for the courts to know. We have a
27 mother, father, autistic twins and two other children at this encampment. The Union was
28 able to get the mother and father and children into a local hotel. The mother and father both

1 work and because of the program they are not allowed to have anybody come and watch
2 their children. Therefore, they need to bring the children to the encampment to be watched
3 so they can work by the mother's mom. The programs that have been put in place are
4 supposed to help people out of homelessness instead they are creating more barriers for
5 multiple families as we receive multiple complaints. While again this encampment is in the
6 city jurisdiction the heat and the fact that the water is no longer being delivered there falls on
7 the county. The family and the children I'm talking about have been featured in the
8 Sacramento Bee multiple times as their belongings have been taken, their inability to obtain
9 shelter from the heat, lack of resourcing, and in fact the picture of their child crying in the
10 window of the RV has been used in multiple stories.

12 9. We had four children die last year in the encampments. We cannot leave people on the
13 streets to die because we can't make a commitment to open a building with air conditioning
14 or to provide water. I urge this Court to compel the County and City to stop the sweeps and
15 open, staff, publicize using sound trucks and provide transportation to at least 20, fully
16 accessible, 24-hours a day cooling centers NOW; not when we are already back in the
17 extreme heat forecasted for the next 14 days.
18

19 I declare under penalty of perjury under the laws of the United States of America and the
20
21 State of California that the foregoing is a true and correct statement.

22 Dated: July 6, 2022
23

24 Executed at Sacramento, California

25 _____
26 _____
27 _____
28 _____

Exhibit A

Sacramento County's unhoused population increases while San Francisco's decreases

Updated: 1:01 PM PDT Jun 29, 2022

Infinite Scroll Enabled



Maricela De La Cruz

Reporter

SACRAMENTO, Calif. — The sight of unsheltered individuals in Sacramento County is a common sight for anyone who lives in the area, and the latest census confirms there are even more people on the street.

The 2022 Sacramento Homelessness Point-in-Time Count was the first in three years, with last year's being canceled due to COVID-19. It is usually conducted every two years.

Advertisement

Sacramento Steps Forward, a private nonprofit organization, is the lead agency in charge of the homeless count. It identified 9,278 individuals experiencing homelessness on any given night, a 67% increase from the last census, which recorded 5,570 individuals experiencing homelessness on any given night.

[See this year's report here.](#)

"Some of the reasons for the increase in unsheltered homelessness in our community and in California is most likely attributed to the high cost of housing and the lack of affordable housing," Lisa Bates with Sacramento Steps Forward said.

Both, sheltered and unsheltered counts increased since 2019.

- 2019 sheltered count: 1,670
- 2022 sheltered count: 2,744
- 2019 unsheltered count: 3,900
- 2022 unsheltered count: 6,664

Recommended

Gov. Newsom is visiting family in Montana. A California travel ban to the state doesn't apply, his team says

The per capita homelessness in Sacramento is estimated to be 59 out of every 10,000 residents.

But as homelessness increased in Sacramento, KCRA 3 asked officials why [San Francisco is reporting a decrease](#) and now have lower numbers. They attributed the numbers partly to how data is collected. They add that preventative work is important to identify people before they fall into homelessness.

KCRA 3 spoke to Kelsey Dison and Kristin Schesser, who say they've been unhoused for about two years.

"It's harder now because once you hit rock bottom it's so hard. They look at you like you're an alien. They don't want to touch you; they don't want to be around you," Dison, who usually stays in downtown Sacramento, said.

Schesser is among the 19% of individuals identified to be living in their vehicles. She moved to Sacramento from Arizona.

"This is just temporary. This isn't something that's going to be permanent for me at all. And, if I go to a camp, I'm settling for that. If I build something that's 'homey,' then I'm settling and I

don't want to get used to it. I want this to be miserable so that I can have the drive to move up," Schesser said.

Nick Golling, the homeless services manager at the Department of Community Response in the city of Sacramento, said they need more shelter space.

"We need spaces that are safe to send people to so that they can work on identifying their barriers to housing and move to that next appropriate step," Golling said.

The Point-in-Time Count also shows that Black individuals, while they represent 11% of the overall Sacramento County population, they also make up 31% of the homeless population, making them three-to-four times more likely to experience homelessness than white individuals.

Since the last PIT count, shelter capacity has increased by 57%, providing shelter to 10,459 persons over three years.

Other key findings:

- American Indian/Alaskan natives represent 2% of Sacramento County's population but made up 7% of the homeless population.
- 58% of unsheltered adults reported having at least one disability.
- A total of 1,600 tents and 1,100 vehicles were identified, four times higher than in 2019. Those in tents made up 30% of the unsheltered, 19% were in vehicles, and 22% were at other locations not considered suitable for human habitation.
- Veterans' homelessness decreased by 6%.
- Unsheltered homelessness by families with children was down by 31% since 2019. Research suggests that federal emergency assistance during the COVID-19 pandemic coupled with vouchers for hotels and motels also contributed to the decline.

GOOD HOUSEKEEPING

Exhibit B



Sacramento 14 Day Extended Forecast

[Time/General](#) [Weather](#) [Time Zone](#) [DST Changes](#) [Sun & Moon](#)

[Weather Today](#) [Weather Hourly](#) [14 Day Forecast](#) [Yesterday/Past Weather](#) [Climate \(Averages\)](#)

Currently: 72 °F. Sunny. (Weather station: Sacramento Executive Airport, USA). [See more current weather](#) >

Sacramento Extended Forecast with high and low temperatures



82 / 59 °F
Sunny.

Feels Like: 80 °F
Humidity: 41%
Precipitation: Rain: 0 Snow: 0
Precipitation Chance: 0%

SSW
Wind: 13 mph

[See weather overview](#) >

Wed
Jul 6

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82 / 68 °F Sunny 84 °F 13 mph 1 10% 0% - 7 (High) 5:48 am 8:33 pm

Thu
Jul 7

85 / 55 °F Sunny. 81 °F 11 mph ↑ 34% 0% - 7 (High) 5:48 am 8:33 pm

Fri
Jul 8

89 / 55 °F Sunny. 84 °F 10 mph ↑ 29% 0% - 7 (High) 5:49 am 8:32 pm

Sat
Jul 9

91 / 55 °F Sunny. 85 °F 10 mph ↑ 26% 0% - 7 (High) 5:49 am 8:32 pm

Sun
Jul 10

100 / 56 °F Sunny. 93 °F 7 mph ↑ 18% 0% - 7 (High) 5:50 am 8:31 pm

Mon
Jul 11

105 / 60 °F Sunny. 97 °F 10 mph ↑ 13% 0% - 7 (High) 5:51 am 8:31 pm

Tue
Jul 12

98 / 63 °F Sunny. 94 °F 12 mph ↑ 18% 0% - 7 (High) 5:51 am 8:31 pm

Wed
Jul 13

96 / 59 °F Mostly sunny. 91 °F 14 mph ↑ 17% 1% - 7 (High) 5:52 am 8:30 pm

Thu
Jul 14

95 / 61 °F Sunny. 88 °F 11 mph ↑ 14% 1% - 7 (High) 5:53 am 8:30 pm

Fri
Jul 15

94 / 60 °F Sunny. 88 °F 10 mph ↑ 11% 1% - 7 (High) 5:54 am 8:29 pm

Sat
Jul 16

94 / 60 °F Sunny. 88 °F 12 mph ↑ 14% 3% - 7 (High) 5:54 am 8:29 pm

Sun
Jul 17

92 / 60 °F Sunny. 87 °F 16 mph ↑ 21% 3% - 7 (High) 5:55 am 8:28 pm

Mon
Jul 18

94 / 60 °F Sunny. 88 °F 9 mph ↑ 15% 3% - 7 (High) 5:56 am 8:27 pm

Tue
Jul 19

97 / 62 °F Sunny. 91 °F 9 mph ↑ 12% 3% - 7 (High) 5:57 am 8:27 pm

Wed
Jul 20

97 / 63 °F Sunny. 91 °F 12 mph ↑ 13% 3% - 7 (High) 5:57 am 8:26 pm

* Updated Wednesday, July 6, 2022 8:22:55 am Sacramento time - Weather by CustomWeather, © 2022

[Hour-by-hour weather for Sacramento next 7 days >](#)

Advertising

Exhibit C

Sacramento hit with lawsuit by homeless union advocates over respite centers



Sacramento Homeless Union members filed a lawsuit against the city and county over respite centers, places for unhoused people to chill out and get access resources.

Author: abc10.com

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